

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION

UNITED STATES OF AMERICA	§	
	§	
v.	§	4:14-CR-164- Y
	§	
CHARLES WESLEY WRIGHT (1)	§	

DEFENDANT CHARLES WESLEY WRIGHT'S
DESIGNATION OF EXPERT WITNESS

COMES NOW, the Defendant, CHARLES WESLEY WRIGHT, by his counsel, Christopher A. Curtis, Assistant Federal Public Defender, and hereby files this his written designation of expert in the above styled case, and shows the Court the following:

1. The defendant hereby designates **Bill McGregor** as an expert for trial, employed at E-Investigations, 16121 North Eldridge Parkway Suite 8, Tomball, TX 77377 (832-230-2851). It is anticipated that Mr. McGregor will provide expert testimony relating to digital forensics, including forensic examinations of computers and computer devices, forensic digital imaging, remote access, and hacking. Furthermore, Mr. GcGregor will testify regarding forensic image storage on digital devices including computers, mobile devices, and video devices. Specifically, the defense expects that Mr. McGregor will be able to testify regarding whether the computer in question was susceptible to being remotely accessed. Also, Mr. McGregor can testify regarding the issue of whether anyone can definitively determine whether a digitally stored images has been altered or manipulated or is an image of a real minor – provided the evidence presents such an issue in this case.

2. The defendant also hereby designates **Brett Welaj** (Systems Analyst) and **Melissa Keck** (Investogator), both employed with the Federal Public Defender's Office, as experts for trial. Both Mr. Welaj and Ms. Keck can testify regarding the forensic examination of the computers in question

and also may testify regarding the possibility the computers in question were capable of being remotely accessed.

Respectfully submitted,
JASON HAWKINS
Federal Public Defender

BY: /s/ Christopher A. Curtis
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CERTIFICATE OF SERVICE

I, CHRISTOPHER A. CURTIS, hereby certify that on September 18, 2014, I electronically filed the foregoing designation with the clerk for the U.S. District Court, Northern District of Texas, using the electronic filing system for the court. The electronic case filing system sent a "Notice of Electronic Filing" to AUSA Aisha Saleem, who presumably has consented in writing to accept this Notice as service of this document by electronic means.

/s/ Christopher A. Curtis
CHRISTOPHER A. CURTIS